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Attorneys for Defendant

NATIONAL CREDIT ADJUSTERS, LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

DEMETRE DURHAM,

Plaintiff,

v.

NATIONAL CREDIT ADJUSTERS,  
LLC,

Defendant.

CIVIL NO. 1:23-cv-00244-MWJS-WRP

**DEFENDANT NATIONAL CREDIT  
ADJUSTERS LLC'S PROPOSED  
VOIR DIRE QUESTIONS;  
CERTIFICATE OF SERVICE**

Trial Date: September 22, 2025

Trial Judge: Hon. Micah W. J. Smith

**DEFENDANT NATIONAL CREDIT ADJUSTERS, LLC’S  
PROPOSED VOIR DIRE QUESTIONS**

Defendant National Credit Adjusters, LLC (“NCA”), by and through its undersigned counsel, respectfully submits the following proposed voir dire questions for the Court’s consideration.

DATED: Honolulu, Hawai‘i, September 9, 2025.

/s/ *Kukui Claydon*

ANDREW J. LAUTENBACH

KUKUI CLAYDON

XERXES MARTIN (*Pro Hac Vice*)

Attorneys for Defendant

NATIONAL CREDIT ADJUSTERS, LLC

1. Are you familiar with or do you know anything about National Credit Adjusters, LLC?
2. What is your highest level of education?
3. What is your occupation?
4. How long have you been in this occupation?
5. What are the occupation(s) of your immediate family members? How long have they been in this/these occupation(s)?
6. Are any of you suffering from any illness or disability, or currently taking any medications, any of which might affect your ability to sit as a juror in this case?
7. Have you or any family member or close personal friend ever filed a claim or lawsuit of any kind? If so, please explain.
8. Have you or any family member or close personal friend ever served on a jury before? If so, please explain.
9. How many of you have defaulted on a debt in the past?
10. Has anyone ever attempted to collect a debt from you, a member of your family or a close friend?
11. How many of you have been employed by a debt collection agency?
12. Does anyone have any belief or feeling about debt collection companies that might be regarded as a bias or prejudice for or against them?
13. Has anyone ever worked in a position, or had a close friend or family member work in a position where you had to investigate consumer or customer disputes? If so, please raise your hand so we can ask about the details.
14. How many of you have had negative experiences involving credit reports, or have negative opinions about credit reporting in general?
15. Have you, or someone you know, ever disputed information on their credit report, either with a credit reporting agency or with the entity that provided

the disputed information to the credit reporting agency? If so, describe what happened and the outcome.

16. Has anyone ever had difficulty obtaining financing or credit? If so, please raise your hand so we can ask about the details.
17. Has anyone had a negative experience with a collection agency? If so, please raise your hand so we can ask about the details.
18. Has anyone sued or filed a complaint against a credit reporting agency regarding information on your credit report? If so, please raise your hand so we can ask about the details.
19. Has anyone sued or filed a complaint against an entity that provided information that appeared on your credit report? If so, please raise your hand so we can ask about the details.
20. Have you, or someone you know, ever experienced identity theft? If so, please describe what happened and the outcome.
21. If you believe someone owes you money but that person denies owing you money, how many of you believe that that person should provide proof that he or she does not owe the money?
22. How many of you believe that if you are a victim of fraud or identity theft, the reasonable thing is for you to file a police report?
23. Does anyone believe that companies are not entitled to the same treatment under the law as individuals? If so, please raise your hand so we can ask about the details.
24. Do you believe, simply as a result of this lawsuit being filed, that defendant likely violated the law?
25. Do you think that in a dispute between a company and an individual, the company is always wrong? Usually wrong? Often wrong?
26. People have different experiences, and there are times when people believe, for reasons personal to them that they prefer to keep private, that they could not serve as a fair and impartial juror. This case involves a disagreement over

information that appeared on a credit report, a dispute about that, and the investigation of the dispute. Understanding that the case involves those issues, and without asking you publicly to explain your reasons, does anyone know of a reason why you could not be a fair and impartial juror in this case? If so, please raise your hand.

27. Can each of you assure us by raising your hand that you will faithfully follow the Court's instructions on the law, whether you agree with them or not?
28. Can each of you assure us by raising your hand that you will not make up your mind until you have heard all the evidence and the Court's instructions?
29. Do you believe that sympathy or emotion might interfere with your ability to apply the law fairly and impartially?